

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

Reply to the Attention Of: SR-6J

March 19, 2008

Via E-mail and Mail

Dr. Rainer Dornalski
Rutgers Organics Corporation
201 Struble Road
State College, PA 16801-7488

RE: Proposed Mirex Analysis of Discrete Surface Soil Samples
Nease Chemical Site, Salem, Ohio

Dear Rainer:

U.S. EPA and Ohio EPA (the Agencies) have reviewed the letter regarding *Proposed Mirex Analysis of Discrete Surface Soil Samples, Operable Unit 2, Nease Chemical Site, Salem, Ohio*, dated February 28, 2008, sent on your behalf from Golder Associates. You requested the Agencies' approval to conduct mirex analysis on certain discrete soil samples. The discrete surface soil samples were taken as part of the Pre-Design Investigation (PDI) work required to support the remedial design of Operable Unit 2 at the Nease site. Groups of five discrete samples were composited and analyzed for mirex to establish the areal extent of surface soil exceeding the site-specific mirex PRG. The results of the composite samples were reported Baseline Conditions Technical Memorandum. The discrete samples are intended to further refine the delineation of mirex surface soil contamination. The extent of mirex contamination exceeding the soil PRG will determine the size of the cap/cover required by the Record of Decision for Operable Unit 2. You also requested to use TestAmerica (formerly STL) for the mirex soil analysis.

The Agencies are approving your requests with the following conditions:

1. Lateral Extent of Contamination:
 - a. Because sample A-16 exceeds the PRG, additional work will be required to establish the extent of contamination. This can not be determined with the existing archived samples and will require additional field sampling..

US EPA RECORDS CENTER REGION 5

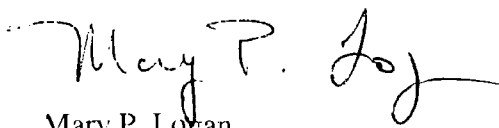


397189

- b. The discrete results from A-15 and A-17 will need to be reviewed quickly because it is likely that additional work will be required to establish the extent of contamination adjacent to some of the sub-samples.
 - c. The discrete results from A-01, A-07, A-08 and A-09 will also need to be reviewed quickly because if access is needed for further delineation on private property, that effort needs to be a priority.
- 2. Ditch Samples – The Agencies would be willing to review the data from each discrete sample comprising A-10 and A-11. However, an alternative approach would be to analyze the two discrete samples at the “end” (the two most northwesterly for A-10 and the two most southeasterly for A-11) to assess ditch conditions at the property boundaries, and to plan to excavate and consolidate the central portion of the ditch under an area that would be capped/covered.
- 3. Age of Samples:
 - a. Presumably, all of the samples will be qualified with a “J” or “UJ” qualifier because of the sample holding time. However, the Agencies need to be able to distinguish all other QC deficiencies for each sample that result in a data qualifier.
 - b. If some of the discrete samples come back below, but close to the PRG, we will have to discuss how best to use the data from the old samples and whether any new samples might be needed.
- 4. Timing of the Work – The Agencies would like to see this work progress as quickly as possible. Because additional field work will be required to support the final design, we expect this work to be completed this year.
- 5. Any areas previously sampled with results above the soil remediation goal that are not proposed for re-sampling (such as AO3 and AO6, and parts of AO8 & AO9) will be addressed during design to be included under the cover.

Please contact me at (312) 886-4699, if you have any questions.

Sincerely,



Mary P. Logan
Remedial Project Manager

cc via email: S. Finn, Golder Associates, Inc.
M. Mankowski, U.S EPA
S. Abraham, Ohio EPA (and hard copy)